

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-1 Referring to the Wholesale Provisioning Tracking System (WPTS) discussed in the "SUPPLEMENTAL INITIAL PANEL TESTIMONY OF VERIZON MASSACHUSETTS, December 17, 2003", provide any and all user manuals, supporting documentation, policies, instructions and communications provided to users on a normal basis intended to assist the user in the WPTS system usage.

REPLY: The following web site is the WPTS user guide, which provides information and instruction for users:

<http://www22.verizon.com/wholesale/lsp/apphome/1,2633,4-WPTS,00.html>

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-2
Provide copies of all training materials related to all hot cut processes, not provided in CONV-VZ-01, provided to the following groups of Verizon employees; CLEC community, the Regional CLEC Coordination Center (RCCC), Verizon frame organization.

REPLY: Verizon MA objects to this Information Request on the grounds that if it were interpreted broadly, it could require the production of any document that refers in any way at all to hot cut processes and procedures. Locating and producing all such documents would be unreasonably and unduly burdensome. Further, to the extent that the Information Request seeks documents related to number portability outside of the context of a hot cut, it is beyond the scope of this proceeding.

Subject to those objections, and without waiving them, attached are copies of methods and procedures provided previously as an attachment to Verizon MA's reply to AT&T 1-39. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order. In addition, the attachment is voluminous, and accordingly, a copy is being provided only to Conversent. The attachment is available for review by other parties at Verizon MA's offices.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-3 Provide examples of output reports from the WPTS with descriptive information on the output report and how users should interpret the output reports.

REPLY: The following web site is the WPTS web based training site, which provides examples and descriptions of reports in WPTS:

<http://www22.verizon.com/wholesale/elearning/wpts/clehotcut/>

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-4 Provide examples of output reports from the WPTS with detailed description of how the reports are used in the day-to-day operations the reports are intended to support.

REPLY: Please refer to Verizon's response to Conversent 6-3.

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**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-5

Provide all information, documentation, work-papers, policies and any other type of information Verizon has access to that identify Verizon's efforts to maintain the accuracy of the information provided by WPTS.

REPLY:

Verizon MA objects to the Information Request on the grounds that determining "all information" relevant to this subject would be unduly burdensome. Further, Verizon MA objects to the requirement that it provide all documents to which it "has access," to the extent that those documents are not actually in its custody, on the grounds that Verizon MA has no obligation under the discovery rules to obtain documents from third-party sources for production in response to interrogatories.

Subject to those objections, and without waiving them, Verizon MA states that WPTS makes use of both real-time and scheduled notification of status changes throughout the life of an order.

The WPTS system receives updates from the Service Order Processor (SOP), Work Force Administration System (WFA), Delphi, Tracker and Frame Operations Management System (FOMS). The updates take place periodically during the normal system hours of operation.

Please also see Verizon's response to Conversent 6-16

VZ # 106

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-6 Provide all information, documentation, work-papers, policies and any other type of information Verizon has access to that identify the current accuracy capabilities of Verizon's WPTS.

REPLY: Verizon MA objects to the Information Request on the grounds that it is overly broad and unduly burdensome to the extent that it purports to require a search for every current or archived e-mail, and every paper file, that may make any sort of reference to the capabilities of WPTS. Verizon MA also objects to the Information Request to the extent it purports to require Verizon MA to obtain, and provide to Conversent, documents to which it "has access" as opposed to documents in its current possession. It is not Verizon MA's obligation to obtain documents for Conversent from third party sources. Finally, Verizon MA objects on the grounds that it is not clear what Conversent means by the "current accuracy capabilities" of WPTS.

Subject to these objections, and without waiving them, Verizon MA states that the WPTS system is configured with automated monitoring throughout the day to ensure interfaces are running as scheduled and to monitors response time and system availability to ensure that the application is processing at peak efficiency.

In addition, please refer to Verizon MA's response to Conversent 6-7.

**Verizon New England Inc.
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Commonwealth of Massachusetts

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Respondent: Kevin Vaninwegen
Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-7 Provide all information, documentation, work-papers, policies and any other type of information Verizon has access to that identify the actual service level performance of the Verizon's WPTS.

REPLY: Verizon MA objects to the Information Request on the grounds that it is overly broad and unduly burdensome to the extent that it purports to require a search for every current or archived e-mail, and every paper file, that may make any sort of reference to the capabilities of WPTS. Verizon MA also objects to the Information Request to the extent it purports to require Verizon MA to obtain, and provide to Conversent, documents to which it "has access," as opposed to documents in its current possession. It is not Verizon MA's obligation to obtain documents for Conversent from third party sources. Subject to those objections, and without waiving them, Verizon MA states that the WPTS system infrastructure is designed to support High Availability and Disaster Recovery System monitoring through Verizon's internal monitoring system. Verizon also monitors response time and system availability to ensure that the application is processing at peak efficiency.

The followings are the WPTS availability results as of 12/29/2003:

- YTD 2003 Availability for the application is 99.98%.
- YTD 2003 Availability for the external Secure Gateway is 99.9%.

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-8 Provide an architectural description and flow charts of the Wholesale Provisioning Tracking System (WPTS).

REPLY: WPTS is a client-server application with a Web based front-end. It operates on the Windows NT platform with a SQL Server databases. Access to CLECs is provided through a secure HTTP Gateway.

Please see the attached flow chart of WPTS.

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**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-9 Provide a description by functionality of all interfaces the WPTS uses in accessing information from Verizon's OSS.

REPLY: SOP - Service Order Processor creates and distributes Verizon's internal service orders.

WFA – Work Force Administration System coordinates and tracks the installation activities for a circuit from the receipt of a work request to the completion of the request. In addition, WFA provides service installation status information.

FOMS – Frame Operations Management System – Contains data used by the central office personnel pertaining to the wiring information to complete a service order.

Delphi – An integrated test and analysis platform that supports the provisioning process. Within the provisioning process flow, Delphi confirms the readiness of a new line or circuit, testing all the elements completely.

Tracker- provides coordination between the network operations and the provisioning centers.

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Commonwealth of Massachusetts

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Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-10 Does Verizon have an upgrade plan in place to support the WPTS?

REPLY: Yes.

VZ # 111

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-11 If yes to CONV-VZ-10 please describe the upgrade plan and process.

REPLY: WPTS enhancements are under review to provide the support needed for the proposed batch hot cut process. Enhancements to WPTS are communicated to the industry via the Change Management Process (CMP) and discussed at the monthly Change Management meetings. Conversent is a recipient of the East CMP Change Request documentation.

Additionally, CMP documentation concerning scheduled releases is available on the Verizon Wholesale website at:

<http://www22.verizon.com/wholesale/local/cmp/1,19224,,00.html>

VZ # 112

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-12 Provide examples of the user interfaces provided by the WPTS.

REPLY: Please refer to Verizon MA's response to Conversent 6-3.

VZ # 113

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent:

Title:

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-13 Provide copies of the Verizon documents provided to developers/project managers/programmers/etc in the initial development of the WPTS that describe the system and personnel requirements for the WPTS.

REPLY: Verizon MA objects to the Information Request on the ground that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

**Respondent:
Title:**

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-14 Provide copies of the acceptance tests and results Verizon used for implementation of the WPTS.

REPLY: Verizon MA objects to the Information Request on the grounds that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-15 Does Verizon have quality control processes at the technician level for users of the WPTS?

REPLY: Yes.

VZ # 116

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-16 Provide Verizon's policies for WPTS quality control of each Verizon interfacing organizations and WPTS user group.

REPLY: The Verizon Hot Cut Process is ISO 9000 certified for the Regional CLEC Coordination Center (RCCC). The RCCC center management performs monthly quality reviews for each associate who coordinates Hot Cuts utilizing WPTS to ensure all documentation is accurately updated in the system.

Supervisors in the central offices, who manage associates in Massachusetts, are required to perform quality reviews to ensure each step of the process is completed. Supervisors review the steps required to utilize WPTS in the central offices where the system has been deployed.

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-17 Please discuss in detail Verizon's definition of a successful hot cut.

REPLY: The New York Carrier-to-Carrier guidelines (C2C), adopted in Massachusetts, define successful hot cuts for the PR-9 metrics:

This metric measures the percent on-time performance for UNE Hot Cut Loops.

A Hot Cut is considered complete when the following situation occurs:

Work is done at the appointed Frame Due Time (FDT) as noted on the LSRC or the work is done at a time mutually agreed upon by the RCCC/CLEC. The time is either within a prescribed interval as noted in the C2C guidelines, or it is a mutually accepted interval agreed upon by Verizon and the CLEC (e.g. project completes by a certain date).

Note: If Verizon re-institutes the acceptance testing process, the percent on time measure will include the time it takes to complete acceptance testing.

A Hot Cut is considered missed when one of the following occurs:

1. Premature disconnect called in to 1-877-HotCuts (otherwise the disconnect would be captured as a Retail trouble).

2. Work was not done (e.g. work was not turned up to CLEC by some means (e-mail, VMS, direct phone call)) by close of intervals noted under Met Hot Cuts definition due to a Verizon reason (e.g. HFC, late turn-up, due date pushed out due to Verizon action).

VZ # 118

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-18 When hot cuts fail or produce “poor” results, does Verizon maintain records of problems associated with the poor hot cut performance levels?

REPLY: Verizon MA objects to this Information Request on the grounds that it is not clear what Conversent means by a hot cut that produces “poor” results.

Subject to such objection, and without waiving it, Verizon MA states that it maintains records sufficient to enable it to comply with its reporting obligations related to the Department’s Carrier-to-Carrier guidelines.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-19 If the answer to CONV-VZ-18 is yes please provide copies of the records Verizon maintains of problems associated with hot cut poor performance levels.

REPLY: Verizon makes detailed data suitable for replicating Verizon's Carrier-to-Carrier metric results available to CLECs on a monthly basis, upon request by the CLEC. Please see Attachment Conversent 6-19a for a description of the data Verizon would make available to CLECs upon such request. Please also see Attachment Conversent 6-19b for the Conversent Communications-specific detailed data that Verizon tracks for calculating the PR-9 hot cut metrics from June 2003 through December 26, 2003.

The data contained in Attachment Conversent 6-19b is proprietary, confidential, competitively sensitive and voluminous. Accordingly, a CD containing the requested information is being made available to the Department and Conversent. It will be provided to other parties, upon their request, in accordance with the Department's Protective Order.

**Verizon New England Inc.
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Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-20 Please discuss in detail Verizon's root cause analysis of any of these problems identified in CONV-VZ-19.

REPLY: The RCCC Quality Analyst Team uses operational information from WPTS to determine where errors may have occurred in the hot cut process and what steps are needed to prevent similar errors from recurring. Appropriate measures are then taken.

VZ # 121

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-21 What is the basis of the ACTIVITY DESCRIPTION, column B, TAB 1 through 10, pages 1- 32 of Exhibit Supp-III? How was this information acquired?

- i. Who provided this activity description?
- ii. What instructions were given to the providers of this information?
- iii. Provide copies of all instructions used in the development of activity descriptions.
- iv. What processes were used to develop the Activity Descriptions?
- v. What controls were applied to the development of the Activity Descriptions to insure accuracy?

REPLY

- i. Please see Verizon MA's Initial Panel Testimony at III.B.3.b.
- ii. Appropriate work center personnel were orally instructed to provide a list of activity descriptions.
- iii. Since there were no written instructions, no copies are available.
- iv. Please see Verizon MA's Initial Panel Testimony at III.B.3.b.
- v. Please see Verizon MA's Initial Panel Testimony at III.B.3.b. In addition, the activity descriptions were reviewed by Service Costs personnel in light of the process flow charts produced per Exhibit II-C and Exhibit II-D.

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-22 What is the basis of the Connect Times, column C, TAB 1 through TAB 10, pages 1- 32 of Exhibit Supp-III?

- i. How was this Connect Time information acquired?
- ii. Who provided the Connect Time?
- iii. What instructions were given to the providers of this Connect Time information?
- iv. Provide copies of all instructions used in the development of Connect Times.
- v. Was averaging a part of the Connect Time information development
- vi. What controls were applied to the development of the Connect Time to insure accuracy?
- vii. Were time and motion studies used in the development of connect time.

REPLY

- i. Please see Verizon MA's Initial Panel Testimony at III.B.3.c.
- ii. Please see Verizon MA's Initial Panel Testimony at II.B.3.c.
- iii. Please see attached proprietary file, Attachment Conversent 6-22, containing survey instructions to respondents. The attachment is considered proprietary, confidential and competitively sensitive, and is being provided to the Department and parties in accordance with the Department's Protective Order.
- iv. See response to iii. above.
- v. Please see Verizon MA's Initial Panel Testimony at III.B.3.c.
- vi. Please see Verizon MA's Initial Panel Testimony at

III.B.3.c and III.B.6.
vii. Please see Verizon MA's Initial Panel Testimony at
III.B.3.c.

VZ # 123

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-23

What is the basis of the Connect Typical Occurrence, column D, TAB 1 through TAB 10, pages 1- 32 of Exhibit Supp-III?

- i. How was this Connect Typical Occurrence data acquired?
- ii. Who provided the Connect Typical Occurrence data?
- iii. What instructions were given to the providers of this Connect Typical Occurrence information?
- iv. Provide copies of all instructions used in the development of Connect Typical Occurrence data.
- v. Was averaging a part of the Connect Typical Occurrence information development?
- vi. What controls were applied to the development of the Connect Typical Occurrence data to insure accuracy?
- vii. What sources of data contributed to the development of the Connect Typical Occurrence data?

REPLY:

- i. Please see Verizon MA's Initial Panel Testimony at III.B.3.d.
- ii. Please see Verizon MA's Initial Panel Testimony at III.B.3.d.
- iii. Appropriate field managers were verbally

instructed to provide Connect Typical Occurrence data.

- iv. Since there were no written instructions, no copies are available.
- v. Please see Verizon MA's Initial Panel Testimony at III.B.3.d.
- vi. Please see Verizon MA's Initial Panel Testimony at III.B.3.d.
- vii. Please see Verizon Initial Panel Testimony at III.B.3.d. Also, for NMC activities 2 and 4, the New York total flow-through rate for August 2003 for all UNEs (23%) was used. Using the New York total flow-through rate is conservative for Massachusetts since New York processes a considerably larger number of UNEs.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-24
What is the basis of the Connect Forward Looking Adjustment, column E, TAB 1 through TAB 10, pages 1- 32 of Exhibit Supp-III?

- i. How was this Connect Forward Looking Adjustment data acquired?
- ii. Who provided the Connect Forward Looking Adjustment data?
- iii. What instructions were given to the providers of this Connect Forward Looking Adjustment information?
- iv. Provide copies of all instructions used in the development of Connect Forward Looking Adjustment data.
- v. Was averaging a part of the Connect Forward Looking Adjustment information development
- vi. What controls were applied to the development of the Connect Forward Looking Adjustment data to insure accuracy?
- vii. What sources of data contributed to the development of the Connect Forward Looking Adjustment data?

REPLY:

- i. Please see Verizon MA's Initial Panel Testimony at III.B.3.e.
- ii. Please see Verizon MA's Initial Panel Testimony

at III.B.3.e.

- iii. Appropriate field managers were verbally instructed to provide Connect Forward Looking Adjustment data.
- iv. Since there were no written instructions, no copies are available.
- v. Please see Verizon MA's Initial Panel Testimony at III.B.3.e.
- vi. Please see Verizon MA's Initial Panel Testimony at III.B.3.e.
- vii. Please see Verizon MA's Initial Panel Testimony at III.B.3.e.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-25

What is the basis of the Disconn. Times, column G, TAB 1 through TAB 10, pages 1-32 of Exhibit Supp-III?

- i. How was this Disconn. Time information acquired?
- ii. Who provided the Disconn. Time?
- iii. What instructions were given to the providers of this Disconn. Time information?
- iv. Provide copies of all instructions used in the development of Disconn. Times.
- v. Was averaging a part of the Connect Time information development
- vi. What controls were applied to the development of the Disconn. Time to insure accuracy?
- vii. Were time and motion studies used in the development of connect time.

REPLY:

- i. Analogous connect times were reviewed by Service Costs personnel, and the same times were applied to the same disconnect activities, where appropriate. For APC and RCMAC, the litigated times from D.T.E. 01-20 were used as described in Verizon MA's Initial Panel Testimony at III.B.3.c).
- ii. Please see response to i. above.
- iii. Please see response to i. above.
- iv. No such instructions exist.

- v. Assuming the question refers to Disconn. time,
please see response to i. above.
- vi. Please see response to i. above.
- vii. Please see response to i. above.

VZ # 126

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-26

What is the basis of the Disconn. Typical Occurrence, column H, TAB 1 through TAB 10, pages 1-32 of Exhibit Supp-III?

- i. How was this Disconn. Typical Occurrence data acquired?
- ii. Who provided the Disconn. Typical Occurrence data?
- iii. What instructions were given to the providers of this Disconn. Typical Occurrence information?
- iv. Provide copies of all instructions used in the development of Disconn. Typical Occurrence data.
- v. Was averaging a part of the Disconn. Typical Occurrence information development?
- vi. What controls were applied to the development of the Disconn. Typical Occurrence data to insure accuracy?
- vii. What sources of data contributed to the development of the Disconn. Typical Occurrence data?

REPLY:

- i. Analogous typical occurrences were reviewed and adjusted by Service Costs personnel. For APC and RCMAC, the litigated Typical Occurrences from D.T.E. 01-20 were used as described in Verizon MA's Initial Panel Testimony at III.B.3.c.
- ii. Please see response to i. above.

- iii. Please see response to i. above.
- iv. No such instructions exist.
- v. Please see response to i. above.
- vi. Please see response to i. above.
- vii. Please see response to i. above. Also, for NMC activities 2 and 4, the New York total flow-through rate for August 2003 for UNE-P (5%) was used. Using the New York total flow-through rate is conservative for Massachusetts since New York processes a considerably larger number of UNE-Ps.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-27

What is the basis of the Disconn. Forward Looking Adjustment, column I, TAB 1 through TAB 10, pages 1-32 of Exhibit Supp-III?

- i. How was this Disconn. Forward Looking Adjustment data acquired?
- ii. Who provided the Disconn. Forward Looking Adjustment data?
- iii. What instructions were given to the providers of this Disconn. Forward Looking Adjustment information?
- iv. Provide copies of all instructions used in the development of Disconn. Forward Looking Adjustment data.
- v. Was averaging a part of the Disconn. Forward Looking Adjustment information development
- vi. What controls were applied to the development of the Disconn. Forward Looking Adjustment data to insure accuracy?

REPLY:

- i. Analogous forward looking adjustments were reviewed and adjusted if necessary by Service Costs personnel, and then applied to the same disconnect activities, where appropriate. For APC and RCMAC, the litigated adjustments from D.T.E. 01-20 were used as described in Verizon

MA's Initial Panel Testimony at III.B.3.c).

- ii. Please see response to i. above.
- iii. Please see response to i. above.
- iv. No such instructions exist.
- v. Please see response to i. above.
- vi. Please see response to i. above.

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d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-28

What is the basis of the Travel to Remote Central Office, cell B44, column B, TAB 1 through TAB 10, page 33 (document “Times By Activity By Organization”) of Exhibit Supp-III?

- i. How was this Travel to Remote Central Office developed?
- ii. Who provided the data for the times used?
- iii. What instructions were given to the providers of this Travel to Remote Central Office data?
- iii. Provide copies of all instructions used in iii above.
- iv. Was averaging a part of the Travel to Remote Central Office-Time?

REPLY

- i. Please see Verizon MA’s Initial Panel Testimony at III.B.3.f.
- ii. Please see Verizon MA’s Initial Panel Testimony at III.B.3.f.
- iii. No instructions were required.
- iii. No such copies exist.
- iv. Please see Verizon MA’s Initial Panel Testimony at III.B.3.f.

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Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-29

What is the basis of the Pre-wire Line (s), cell B45, column B, TAB 1 through TAB 10, (document “Times By Activity By Organization”) found at page 33 of Exhibit Supp-III?

- i. How was this Pre-wire Line (s) developed?
- ii. Who provided the data for the Pre-wire Line (s) time?
- iii. What instructions were given to the providers of this Pre-wire Line (s) data?
- iv. Provide copies of all instructions used in Pre-wire Line (s) time development.

REPLY:

- i. Please see Verizon MA’s Initial Panel Testimony at III.B.3.c.
- ii. Please see Verizon MA’s Initial Panel Testimony at III.B.3.c and f.
- iii. Please see proprietary file provided in reply to Conversent 6-22 containing survey instructions to respondents.
- iv. Please see iii. above.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-30

What is the basis of the Perform Hot Cuts on Due Date cell B46, column B, TAB 1 through TAB 10, (document “Times By Activity By Organization”) page 33 of Exhibit Supp-III?

- i. How was this Perform Hot Cuts on Due Date time developed?
- ii. Who provided the data for the Perform Hot Cuts on Due Date time?
- iii. What instructions were given to the providers of this Perform Hot Cuts on Due Date data?
- iv. Provide copies of all instructions used in Perform Hot Cuts on Due Date time development.

REPLY

- i. Please see Verizon MA’s Initial Panel Testimony at III.B.3.c and f.
- ii. Please see Verizon MA’s Initial Panel Testimony at III.B.3.c and f.
- iii. Please see proprietary file provided in reply to Conversent 6-22 containing survey instructions to respondents.
- iv. Please see iii. above.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-31

Please provide all documents, work-papers and other documentation used to derive and support the data found on Tab “Database”, cells F2 through F49, (document “Times By Activity By Organization”) found at page 33 of Exhibit Supp-III.

REPLY: Please see Verizon MA’s Initial Panel Testimony at III.B.3.f and proprietary Exhibit III-B. Exhibit III-B provides the outputs from the robust regression analyses where times of an “a + bx” nature were used in the cost studies.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-32 Please provide all documents, work-papers and other documentation used to derive and support the data found on Tab “Factors” of document “Times By Activity By Organization” found on page 33 of Exhibit Supp-III.

REPLY: Assuming that the question is referring to the Factors Tab on page 34 of Exhibit Supp-III, Verizon MA responds as follows:

1. Cost of Money:

The value of 11.45% is the value that was approved for Verizon MA by the Department in D.T.E. 01-20. Refer to the May 29, 2003 Order On Verizon Massachusetts’ Compliance Filing in that docket which adopted Verizon MA’s methodology.

2. At Discount Period (years) of and Present Worth Factor:

2.5 years was used as the average life of the UNE in the non-recurring studies approved by the Department in D.T.E. 01-20. Refer to the May 29, 2003 Order On Verizon Massachusetts’ Compliance Filing in that docket which adopted Verizon’s methodology. The 2.5 years had been based on the opinion of the Wholesale Product Line Management organization. The Present Worth Factor of .7626 is simply an EXCEL calculation using the PV function.

3. Common Overhead:

The Common Overhead Factor of 1.101600 is the same

factor used in the UNE non-recurring cost studies approved by this Commission in D.T.E. 01-20. Refer to the May 29, 2003 Order On Verizon Massachusetts' Compliance Filing in that docket which adopted Verizon MA's methodology.

4. Gross Revenue Loading:

The Gross Revenue Loading Factor of 1.002707 is the same factor used in the non-recurring studies approved by the Department in D.T.E. 01-20. Refer to the May 29, 2003 Order On Verizon Massachusetts' Compliance Filing in that docket which adopted Verizon MA's methodology.

5. Labor Trend Factor:

Please see Verizon MA's Initial Panel Testimony at pages 58 - 59.

6. Probability of Spare Copper/UDLC at SAI:

50% is used. It is an estimate, since so few IDLC-served lines have been involved in hot cuts to date.

7. Travel as a Percentage of CO Worktime:

Please see Verizon MA's Initial Panel Testimony at page 56.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Maryellen Langstine

Title: Director

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-33 Please discuss the entity and the decision making process that governs OSS investments and OSS improvements. As part of the answer, please discuss and identify the decision criteria used by VZ in determining whether certain proposed investments and improvements in OSS will be made or rejected. Also discuss whether VZ performs a cost benefit analysis as part of the decision making process. Unless the answer is an unqualified no, please identify the various cost and benefit components that are reflected in the analysis. Please provide all documents that support the answer.

REPLY: Insofar as an OSS change would impact CLEC interfaces with Verizon, the decision making process that governs such changes is the OSS Change Management Process. This process was jointly developed by Verizon and the CLECs for managing the life cycle of system changes throughout Verizon. The process is designed to accommodate changes requested by CLECs, changes requested by Verizon, emergency changes, and changes required by standards bodies or regulatory authorities. Verizon receives requests from CLECs for systems changes and works with CLECs to define requirements and prioritize system changes. Verizon also oversees publication of the documentation of system changes through the business rules, technical guides, and other documentation, as required. To manage the process of changing OSS and CLEC interfaces effectively, Verizon adopted a regular schedule of "CLEC-affecting" software releases. "CLEC-affecting" releases are those that change

Verizon's side of the CLEC interface or are likely to require changes to the CLEC's side of the interface. There are three releases each year in February, June, and October for CLEC-affecting software changes. The releases incorporate changes initiated by Verizon or the CLECs as well as changes resulting from changed regulatory requirements or from changes in the industry standards. For these releases, Verizon developed a published, predictable software release schedule that provides advance notice and planning to Verizon and CLECs for changes that affect the interfaces between the companies. This schedule conforms to the notification time lines of the OSS Change Management process and provides for a CLEC test period prior to production implementation.

Verizon uses a number of criteria as to determine when and if changes are made to the OSS. These include: meeting regulatory mandates and current industry standards, priorities assigned by the CLECs, the complexity of the proposed change, technical feasibility of the change, and the relationship between a change and other pending changes already scheduled into a release. Verizon also considers the development resources that are available. The actual software development process bundles multiple changes or initiatives into scheduled releases. Development resources are assigned to the releases rather than to the individual initiatives.

Verizon objects to this interrogatory to the extent that it seeks "all documents that support the answer," on the ground that such request is vague and ambiguous, and on the additional ground that compliance would be unduly burdensome. Subject to such objection, and without waiving it, Verizon states that documentation pertaining to the Change Management process can be found on Verizon's Wholesale web site at:

<http://www22.verizon.com/wholesale/local/cmp/1,19224,,00.html>

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-34

On page 15 of the Initial Hot Cut Panel Testimony, dated November 14, 2003, VZ states: "Subject to those two essential qualifications, Verizon of MA's hot cut processes use automated technology to the maximum extent that is practical and efficient. " With respect to this statement, please answer the following questions:

- i. What criteria are used to determine what is "practical" and what is "efficient." Please provide all documents that support the answer.
- ii. Please discuss whether VZ views the current situation as the best that can be achieved and no further improvements can be achieved. Unless the answer is an unqualified yes, please discuss what improvements can still be achieved, when VZ believes they will be implemented and detail the planned improvements. Please provide all supporting documentation.

REPLY:

- i. Practicality and efficiency are determined based on the seasoned judgment of the Verizon personnel managing the Company's hot cut process;
- ii. Any "current situation," for any system or process, is theoretically subject to future improvement, although it is not possible to predict all the improvements that will be made in the future. Verizon is continually investigating opportunities to enhance WPTS. Verizon will continue to work

with the industry through Change Management to implement appropriate system enhancements.

VZ # 135

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-35 Please identify what assumptions were made for purposes of the non-recurring cost studies with respect to the technology mix for loop facilities. As part of the answer, please identify the following:

- i. the percentage of loops served on copper feeder and distribution facilities,
- ii. the percentage of loops served on fiber based feeder facilities and copper distribution facilities (and please identify what percentage of those fiber based loops are assumed to be NGDLC versus UDLC.)
- iii. the percentage of loops that 100% fiber based loops.

REPLY: Assumptions with respect to technology mix for loop facilities are not required for the development of the non-recurring costs at issue in this proceeding.

- i. Not applicable to non-recurring cost study.
- ii. Not applicable to non-recurring cost study.
- iii. Not applicable to non-recurring cost study.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-36 Are the cost of disconnect activities the costs for future disconnects (subsequent to the connect activities) or are these the disconnect activities associated with the cutover of the facilities that precede the connect activities.

REPLY: The cost of disconnect activities (as identified in Column J in Tabs 1-8) are the costs for future disconnects. Also, please see Verizon MA's Initial Testimony at III.B.7.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-37 Please identify all instances in which time and motion studies were used to support the labor time estimates include the cost studies. Further, provide all documents associated with those time and motion studies.

REPLY: Please see Verizon MA's reply to Information Request AG Set 2-1. The CD provided in reply to AG 2-1 contains scanned copies of each completed survey. The data contained on the CD is proprietary, confidential and competitively sensitive and is provided in accordance with the terms of the Department's Protective Order. Copies were provided at that time only to the Department and the Attorney General. A copy will be provided to other parties upon request.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent:

Title:

REQUEST:

Conversent Communications of Massachusetts, LLC

DATED:

December 22, 2003

ITEM: Conversent 6-38

Please provide to Conversent responses to all information requests of all other active parties to this proceeding.

REPLY:

Verizon MA has provided and will continue to provide responses to information requests by all other parties in this proceeding.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

**Respondent:
Title:**

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-39 Referring to Verizon switch contracts with Nortel and Lucent, provide the Verizon cost for each vendor on a per line basis for vendor services for an office replacement (for example, an analog switch replacement migrating existing customers from the old switch technology to the new switch technology) scenario. Include a copy of the vendor contracts illustrating this cost.

REPLY: Verizon MA objects to this Information Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent:

Title:

REQUEST:

Conversent Communications of Massachusetts, LLC

DATED:

December 22, 2003

ITEM: Conversent 6-40

List the details of the main distribution frame wiring and testing service provided by the vendors Nortel and Lucent in a switch replacement scenario.

REPLY:

Verizon MA objects to this Information Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent:

Title:

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-41 Referring to Verizon switch replacement scenarios, provide a list of task and the activity times on a per line basis which Verizon expends over and beyond those provided by the switch vendor. On a per line basis provide Verizon's cost for these switch replacement tasks.

REPLY: Verizon MA objects to this Information Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent:

Title:

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-42

Referring to Verizon switch contracts with Nortel and Lucent, provide the Verizon cost for each vendor on a per line basis for vendor services for an area cut (for example the transfer of customer service from one wire center area to another wire center area, generally a cross boundry transfer) MDF wiring and testing scenario. Include a copy of the vendor contracts illustrating this cost.

REPLY: Verizon MA objects to this Information Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen
Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-43 In Verizon's opinion, what Verizon win-back service order activity is similar too the hot cut processes?

REPLY: Verizon MA objects to this Information Request on the grounds that it is simply not clear what information is being sought by Conversent.

Subject to that objection, and without waiving it, Verizon MA states that if a customer is migrating to Verizon's retail service from UNE-P or Resale, there is no provisioning activity. For migrations from UNE-L, the physical cutover process for a win-back is identical to that of a conventional hot cut in that cross connects are moved on the frame from the old local service provider's switch to the new local service provider's switch. Verizon is the new local service provider and the CLEC is the old one.

On the due date, assuming the loop information as requested by Verizon is available, the CLEC dial tone is lifted off the loop termination and replaced with the jumper coming from Verizon's switch. The Winback Control Center (WCC) activates the port into the Verizon switch once the frame's work is completed.

If the loop information is not obtained, the order is processed as a new loop. In this case, the order requires a Verizon field technician dispatch to complete the installation. Upon completion of the loop work the field technician calls the WCC to request that the port be worked.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-44 Describe the cut-over process for Verizon win-back customers for coordinated cuts involving change orders.

REPLY: Verizon MA objects to this Information Request on the grounds that it cannot determine what information Conversent is seeking. Further, Verizon MA does not understand what Conversent is referring to by the term “coordinated cuts involving change orders”.

However, to the extent the interrogatory refers to Winback processes, please refer to Conversent 6-43.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-45 Describe the cut-over process for Verizon win-back customers for coordinated cuts involving to and from “T&F” orders.

REPLY: Verizon MA objects to this Information Request on the grounds that it does not understand what information is being sought by Conversent. In particular, Verizon MA does not understand Conversent’s reference to “coordinated cuts” in the retail context.

Subject to that objection, and without waiving it, Verizon MA states that there is no special winback process for “T&F” order. For a general description of the winback process, see Verizon MA’s response to Conversent 6-43.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Carleen Gray
Title: Senior Specialist, Wholesale
Markets

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-46 What additional charges do win-back customers pay when coordinated cuts are required for the provisioning of services?

REPLY: Verizon MA objects to this Information Request on the grounds that it relates to Verizon's retail charges, and thus is not reasonably calculated to lead to the discovery of evidence that would be admissible in and relevant to this proceeding. In addition, it is not clear what Conversent means by referring to "coordinated cuts" in the retail context.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-47 What Verizon organizations are involved in win-back customer coordinated cuts?

REPLY: Verizon MA objects to this Information Request on the grounds that it is not clear what Conversent means by “win-back customer coordinated cuts.”

Subject to such objection, and without waiving it, Verizon MA refers Conversent to its response to Conversent 6-43, and further states that the organizations that are or may be involved in winback activity include Verizon’s retail service centers, the Winback Control Center, the Local Number Portability Center, the Central Office, the RCMAC, and the field Dispatch Resource Center.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-48
What are the responsibilities of Verizon organizations involved in win-back customer coordinated cuts?

REPLY: Verizon MA objects to this Information Request on the grounds that it is not clear what Conversent means by “win-back customer coordinated cuts.”

Subject to such objection, and without waiving it, Verizon MA provides the following information for the organizations that are or may be involved in winback activity:

- Winback orders are initiated in retail service centers. The retail group also obtains the serving loop information from the CLEC.
- The Winback Control Center (WCC) coordinates migration activity.
- The Local Number Portability (LNP) Center activates the port.
- The Central Office performs wiring and dial tone checks and the actual moving of the cross connects on the due date.
- The Recent Change Memory Administration Center (RCMAC) sets translations in the Verizon switch.
- The field Dispatch Resource Center coordinates the field dispatch, if required.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-49 Provide copies of the detail business processes Verizon uses for win-back customer coordinated cuts?

REPLY: Verizon MA objects to this Information Request on the grounds that it is not clear what Conversent means by “win-back customer coordinated cuts.” Verizon MA also objects to the Information Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to those objections, and without waiving them, Verizon MA refers Conversent to its response to Conversent 6-43.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-50
From Verizon's perspective describe in detail the differences between win-back coordinated cuts and wholesale coordinated cuts?

REPLY: Verizon MA objects to this Information Request on the grounds of the ambiguity of the terms "winback coordinated cuts" and "wholesale coordinated cuts."

Subject to that objection, and without waiving it, Verizon MA states that the key differences between a "winback" and a conventional hot cut is that in a winback no pre-wiring is required and no coordination with the CLEC is necessary to ensure that dialtone is available since the new dialtone will be provided by Verizon. The process also differs in that Verizon will need to ensure that the old local service provider has notified NPAC of the pending port to the Verizon switch.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Richard Reich

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-51 When errors in service request are encountered by Verizon technicians during the Verizon Hot Cut process, how are these errors resolved?

REPLY: If any discrepancy is found, such as no dial tone on CLEC's switch on DD-2 or on DD, the technicians are directed to immediately notify the RCCC and proceed under the directions of an RCCC coordinator.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Richard Reich

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-52
How do technicians charge the time they spend resolving problems on Verizon Hot Cuts?

REPLY: Technicians use the WFA system to track their time. Time worked on resolving hot cut problems is not separately identified, however.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Richard Reich

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-53
Provide Verizon time reporting records demonstrating the amount of time Verizon technicians spend resolving problems with Verizon Hot Cuts?

REPLY: Verizon MA objects to this Information Request to the extent that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to that objection, and without waiving it, Verizon MA states that it does not in the ordinary course of its business maintain records that specifically track the amount of time its technicians spend resolving problems for hot cuts.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Vaninwegen

Title: Manager

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-54 Does Verizon do hot cuts in Vermont using the WPTS process?

REPLY: Verizon MA objects to this Information Request on the grounds that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to that objection, and without waiving it, Verizon states that Verizon New England does utilize the WPTS process in Vermont.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: John Conroy / John White
Title: Vice President / Exec. Director

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-55 Please identify all of the central offices in Massachusetts (by name and CLLI code) in which NEON has a collocation arrangement. Please identify the type of collocations.

REPLY: Verizon MA objects to this Information Request on the grounds that the question is overly broad, asks for information that is not relevant to the triggers analyses at issue in this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to those objections, and without waiving them, Verizon MA responds as follows:

Please see the proprietary version of Attachment 3, which was attached to the Supplemental Panel Testimony of Verizon MA filed on December 19, 2003. Attachment 3 lists the direct interoffice routes (i.e., pairs of wire centers) where competitive carrier facilities meet one or more of the FCC's transport triggers and for each pair of wire centers identifies the relevant carriers that have non-Verizon-provided transport facilities terminated in a competitive alternate transport terminal ("CATT") or collocation arrangement.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: John Conroy / John White
Title: Vice President / Exec. Director

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-56 Please identify all of the central offices in Massachusetts (by name and CLLI code) in which NSTAR has a collocation arrangement. Please identify the type of collocations.

REPLY: Verizon MA objects to this Information Request on the grounds that the question is overly broad, asks for information that is not relevant to the triggers analyses at issue in this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to those objections, and without waiving them, Verizon MA responds as follows:

Please see Verizon MA's response to Conversent 6-55.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: John Conroy / John White
Title: Vice President / Exec. Director

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-57 Please identify all of the central offices in Massachusetts (by name and CLLI code) in which Metromedia Fiber Network has a collocation arrangement. Please identify the type of collocations.

REPLY: Verizon MA objects to this Information Request on the grounds that the question is overly broad, asks for information that is not relevant to the triggers analyses at issue in this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to those objections, and without waiving them, Verizon MA responds as follows:

Please see Verizon MA's response to Conversent 6-55.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: John Conroy / John White
Title: Vice President / Exec. Director

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-58 Please identify all of the central offices in Massachusetts (by name and CLLI code) in which Wiltel has a collocation arrangement. Please identify the type of collocations.

REPLY: Verizon MA objects to this Information Request on the grounds that the question is overly broad, asks for information that is not relevant to the triggers analyses at issue in this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to those objections, and without waiving them, Verizon MA responds as follows:

Please see Verizon MA's response to Conversent 6-55.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: John Conroy / John White
Title: Vice President / Exec. Director

REQUEST: Conversent Communications of Massachusetts, LLC

DATED: December 22, 2003

ITEM: Conversent 6-59 Please identify all of the central offices in Massachusetts (by name and CLLI code) in which Fiber Tech has a collocation arrangement. Please identify the type of collocations.

REPLY: Verizon MA objects to this request on the grounds that the question is overly broad, asks for information that is not relevant to the triggers analyses at issue in this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to those objections, and without waiving them, Verizon MA responds as follows:

Please see Verizon's response to Conversent 6-55.